

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

DANNI SUTANA,

Plaintiff,

vs.

Case No.: 1:13-CV-00210-JCH-LAM

STATE OF NEW MEXICO, ECONOMIC DEVELOPMENT DEPARTMENT;
JONATHAN ("JON") BARELA, individually and in his official capacity;
BARBARA G. BRAZIL, individually and in her official capacity;
WADE JACKSON, individually and in his official capacity;

Defendants.

AFFIDAVIT OF BINA SHAHANI

STATE OF NEW MEXICO)
) ss.
COUNTY OF SANTA FE)

I, Bina Shahani affirm and state the following:

1. I work in the New Mexico Firm as a para-legal.
2. I handled some of the communications with Dr. Kleiner, Ph.D.
3. On or about September 23, 2013, Mr. Thompkins and I flew to California and met with Dr. Kleiner regarding Danni Sutana's case. I did not bill for my time in traveling and meeting with Dr. Kleiner.
4. I handled the receipts and billings related to Dr. Kleiner. On or about September 23, 2013, Dr. Kleiner discussed with Mr. Thompkins needing an additional retainer of \$1,500.
5. In the invoice submitted to Ms. Sutana for review, I incorrectly included the \$1,500 amount because I mistakenly thought the firm had sent an additional \$1,500.
6. The initial retainer amount paid by the Firm was only \$1,000.00.

Exhibit II

7. I e-mailed the invoice to Ms. Sutana in January 2013 and while I exchanged e-mails with Ms. Sutana she never raised any concern about the invoice or objected to the times and amounts charged.

FURTHER AFFIANT SAYETH NOT.



Bina Shahani

SUBSCRIBED AND SWORN before me this 25 day of June, 2015, by Bina Shahani.

[SEAL]



OFFICIAL SEAL
TINA M ZAMORA
NOTARY PUBLIC-State of New Mexico
My Commission Expires April 9th 2018


NOTARY PUBLIC

My Commission Expires on:

April 9th 2018

Exhibit II